

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Peters-Revington Furniture  
1100 N. Washington Street  
Delphi, Indiana 46923-0238**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T015-6045-00021	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date:  Expiration Date:

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- D.2.3 Wood Furniture Manufacturing Operations NESHAP [326 IAC 20-14-1] [40 CFR 63]
- D.2.4 Work Practice Standards [40 CFR 63.803]
- D.2.5 Particulate Matter (PM) [326 IAC 6-3-2]
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- D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8]
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- D.3.4 Wood Furniture Manufacturing Operations NESHAP [326 IAC 20-14-1] [40 CFR 63]
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#### **Emergency Occurrence Report**

#### **Quarterly Report: Plant 2 Monthly VOC Usage**

#### **Quarterly Report: Plant 2 VOC Daily Volume-Weighted Average**

#### **Quarterly Report: Plant 3 VOC Usage**

#### **Semi-Annual Continuous Compliance Report: Wood Furniture NESHAP**

#### **Quarterly Deviation and Compliance Monitoring Report**

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary wood furniture manufacturing operation.

Responsible Official:	<b>Bill Massengill, President</b>
Source Address:	<b>1100 N. Washington Street, Delphi, IN 46923</b>
Mailing Address:	<b>1100 N. Washington Street, Delphi, IN 46923-0238</b>
SIC Code:	<b>2511</b>
County Location:	<b>Carroll</b>
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

#### (a) Plant 1:

- (1) Twelve (12) spray booths identified as No. 101 through 112; eleven (11) of the spray booths are controlled by dry filters and one (1) is controlled by water wash;
- (2) One (1) roll coating line; and
- (3) One (1) curtain coating line.

#### (b) Plant 2:

Ten (10) spray booths identified as No. 201 through 210, also known as the Building 16 coating facilities; nine of the spray booths are controlled by dry filters and one (1) is controlled by water wash.

#### (c) Plant 3:

- (1) Three (3) air assisted airless surface coating spray booths, identified as EP-P(2), EP-P(3), and EP-P(10), each equipped with a dry filter system controlling particulate matter (PM) overspray emissions;
- (2) One (1) air assisted airless surface coating spray booth, identified as EP-P(5), equipped with a water curtain controlling PM overspray emissions; and
- (3) Five (5) airless surface coating spray booths, identified as EP-P(4), EP-P(6), EP-P(7), EP-P(8), and EP-P(9), each with a dry filter system controlling PM overspray.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Woodworking operations: [326 IAC 2-2] [326 IAC 2-7-1(21)(G)(xxix)] [326 IAC 6-3]
  - (1) Plant 1 and Plant 2 woodworking facilities for furniture manufacturing, with baghouses for PM control.
  - (2) Plant 3 woodworking facilities:
    - (A) One (1) wood milling and sanding process, with two (2) dust collection systems including two (2) baghouses, identified as 8503 East and 8503 West; and
    - (B) One (1) wood furniture assembly process.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## GENERAL CONDITIONS

## B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

**B.2 Permit Term [326 IAC 2-7-5(2)]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

#### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

**B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]  
[326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.



- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (e) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (f) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (g) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (h) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (i) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;



- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]  
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]  
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]  
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (c) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that

compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.



**C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-Annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

**C.22 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

(a) Plant 1:

- (1) Twelve (12) spray booths identified as No. 101 through 112; eleven (11) of the spray booths are controlled by dry filters and one (1) is controlled by water wash;
- (2) One (1) roll coating line;
- (3) One (1) curtain coating line.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8]

Any change or modification which may increase potential emissions from the surface coating operation, shall require prior approval from the OAQ to determine applicability requirements of 326 IAC 8, before such change may occur.

#### D.1.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart JJ.

#### D.1.3 Wood Furniture Manufacturing Operations NESHAP [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]

- (a) The wood furniture manufacturing operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, incorporated by reference as 326 IAC 20-14-1, with a compliance date of November 21, 1997.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
  - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids, as applied; or
    - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
    - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
    - (D) Use any combination of (A), (B), and (C).
  - (2) Limit VHAP emissions from contact adhesives as follows:

- (A) Use compliant contact adhesives as follows:
  - (i) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids;
  - (ii) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids;or
- (B) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids, as applied.

#### D.1.4 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall maintain a written work practice implementation plan, as required by 40 CFR 63.803(a). The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

#### D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the coating spray booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

### **Compliance Determination Requirements**

#### D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

- (b) The Permittee is not required to test these facilities by this permit.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.8 Particulate Matter (PM)**

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In order to comply with D.1.5, the particulate matter overspray control systems (dry filters and waterwash systems) shall be in operation and control emissions from the coating spray booths at all times when the spray booths are in operation.

**D.1.9 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters.
- (b) Daily inspections shall be performed to verify that the water curtain flow is making water/air contact along the entire length of the air opening. Should more than ten percent (10%) of the water curtain area be ineffective in impacting the air stream, then repairs or adjustments shall be completed. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water curtain.
- (c) To monitor the performance of the dry filters and water curtain, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (d) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (e) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.10 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP and VOC usage limits established in Condition D.1.3.
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
- (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
- (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.
- (4) The VHAP content in weight percent of each thinner used.

- (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (c) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) For compliance with Section C - Emission Statement requirements, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be complete and sufficient to document annual Plant 1 VOC usage.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The total VOC usage for each calendar year; and
  - (3) The weight of VOCs emitted for each calendar year.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

- (a) A semi-annual NESHAP Continuous Compliance Report to document compliance with Conditions D.1.3 and D.1.4 shall be submitted using the reporting form located at the end of this permit, or the equivalent, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
- (2) July 1 through December 31.
- (b) The report required in (a) of this condition shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

(b) Plant 2:

Ten (10) spray booths identified as No. 201 through 210, also known as the Building 16 coating facilities; nine of the spray booths are controlled by dry filters and one (1) is controlled by water wash.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 PSD BACT Limit [326 IAC 2-2-3] [40CFR 52.21]

- (a) Pursuant to 326 IAC 2-2-3 (PSD Best Available Control Technology (BACT) Requirements) and Construction Permit PSD (08) 1692, issued on July 14, 1988, the Building No. 16 furniture coating facilities shall use not more than 33 tons of volatile organic compound (VOC), including coatings, dilution solvents, and cleaning solvents, per month.
- (b) Pursuant to 326 IAC 2-2-3 (PSD BACT requirements):
- (1) The volume-weighted average volatile organic compound (VOC) content used at the Building No. 16 furniture coating facilities shall be limited to not more than 6.54 pounds of VOC per gallon of coating minus water delivered to the coating applicator. Compliance with this limit shall be determined on a daily basis.
  - (2) The type of applicator used for all coatings shall be Airless, Air-Assisted Airless, or High Volume Low Pressure (HVLP). Alternate application methods may be used if the transfer efficiency of the alternate is equivalent to or greater than that of the listed methods. HVLP spray application is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

#### D.2.2 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

#### D.2.3 Wood Furniture Manufacturing Operations NESHAP [326 IAC 20-14-1] [40 CFR 63]

- (a) The wood furniture manufacturing operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, incorporated by reference as 326 IAC 20-14-1, with a compliance date of November 21, 1997.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids, as applied; or

- (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
  - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
  - (D) Use any combination of (A), (B), and (C).
- (2) Limit VHAP emissions from contact adhesives as follows:
- (A) Use compliant contact adhesives as follows:
    - (i) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids;
    - (ii) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids;or
  - (B) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids, as applied.

#### D.2.4 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall maintain a written work practice implementation plan, as required by 40 CFR 63.803(a). The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

#### D.2.5 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from each of the coating spray booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

### Compliance Determination Requirements

#### D.2.7 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC usage limitation contained in Condition D.2.1(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.
- (b) The volume-weighted averaging of the coatings used to determine compliance with the limitation set in Condition D.2.1(b)(1) shall be determined by the following equation:

$$A = [3 (C_1 \times U_1) + (C_2 \times U_2) + (C_3 \times U_3) + \dots (C_x \times U_x)] / 3 U_1 + U_2 + U_3 + \dots + U_x]$$

Where: A is the daily volume-weighted average in pounds VOC per gallon;  
C is the VOC content of an individual coating in pounds VOC per gallon; and  
U is the usage rate of the individual coating in gallons per day.

The VOC content of an individual coating shall be determined pursuant to 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

#### D.2.8 VOC Emissions

- (a) Compliance with Condition D.2.1(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month.
- (b) Compliance with Condition D.2.1(b)(1) shall be demonstrated within 30 days of the end of each day, using the equation in Condition D.2.7(b).

#### D.2.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) The Permittee is not required to test these facilities by this permit.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.2.10 Particulate Matter (PM)

Pursuant to Construction Permit PSD (08) 1692, issued on July 14, 1988, and in order to comply with Condition D.2.5, the particulate matter overspray control systems (dry filters and waterwash systems) shall be in operation and control emissions from the coating spray booths at all times when the coating spray booths are in operation.

#### D.2.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters.



- (b) Daily inspections shall be performed to verify that the water curtain flow is making water/air contact along the entire length of the air opening. Should more than ten percent (10%) of the water curtain area be ineffective in impacting the air stream, then repairs or adjustments shall be completed. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water curtain.
- (c) To monitor the performance of the control systems, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (d) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (e) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.2.12 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.1(a) and (b)(1), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (3) shall be taken daily; records maintained for (4) and (5) shall be taken monthly. Records shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.2.1.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume-weighted VOC content of the coatings used for each day;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP and VOC usage limits established in Condition D.2.3.
  - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

- (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.
  - (4) The VHAP content in weight percent of each thinner used.
  - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.2.4, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
  - (d) To document compliance with Conditions D.2.10 and D.2.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
  - (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.13 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.2.1(a) and (b)(1) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. These reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) A semi-annual NESHAP Continuous Compliance Report to document compliance with Conditions D.2.3 and D.2.4 shall be submitted using the reporting form located at the end of this permit, or the equivalent, within thirty (30) days after the end of the six (6) months being reported. This report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
- (2) July 1 through December 31.

The report shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

## SECTION D.3 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

(c) Plant 3:

- (1) Three (3) air assisted airless surface coating spray booths, identified as EP-P(2), EP-P(3), and EP-P(10), each equipped with a dry filter system controlling particulate matter (PM) overspray emissions;
- (2) One (1) air assisted airless surface coating spray booth, identified as EP-P(5), equipped with a water curtain controlling PM overspray emissions;
- (3) Five (5) airless surface coating spray booths, identified as EP-P(4), EP-P(6), EP-P(7), EP-P(8), and EP-P(9), each with a dry filter system controlling PM overspray.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 PSD BACT Limit [326 IAC 2-2-3]

Pursuant to 326 IAC 2-2-3 (PSD BACT) and Construction Permit 015-3574, issued on January 20, 1995, VOC Best Available Control Technology (BACT) shall be considered satisfied provided that:

- (a) The total amount of volatile organic compounds delivered to the applicators of the surface coating spray booths EP-P(2) through EP-P(10) does not exceed 295 tons per 365 consecutive day period, rolled on a daily basis, and
- (b) The following pollution prevention techniques are applied:
  - (1) The cleanup solvents shall be stored in closed containers with soft gasketed spring-loaded closures;
  - (2) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly, and
  - (3) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

#### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application  
Air Assisted Airless Spray Application  
Electrostatic Spray Application  
Electrostatic Bell or Disc Application  
Heated Airless Spray Application  
Roller Coating  
Brush or Wipe Application  
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.3.3 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.3.4 Wood Furniture Manufacturing Operations NESHAP [326 IAC 20-14-1] [40 CFR 63]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
  - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids, as applied; or
    - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
    - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
    - (D) Use any combination of (A), (B), and (C).
  - (2) Limit VHAP emissions from contact adhesives as follows:
    - (A) Use compliant contact adhesives as follows:
      - (i) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids;
      - (ii) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids;or
    - (B) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
  - (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids, as applied.

#### D.3.5 Work Practice Standards [40 CFR 63.803]

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The owner or operator of an affected source subject to this subpart shall maintain a written work practice implementation plan, as required by 40 CFR 63.803(a). The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

#### D.3.6 Particulate Matter (PM) [326 IAC 6-3-2(c)]

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The PM from each of the coating spray booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.3.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

---

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

### Compliance Determination Requirements

#### D.3.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63]

---

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) The Permittee is not required to test these facilities by this permit.

#### D.3.9 Volatile Organic Compounds (VOC)

---

Compliance with the VOC usage limitation contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

#### D.3.10 VOC Emissions

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Compliance with Condition D.3.1 shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage for the most recent twelve (12) month period.

## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.3.11 Particulate Matter (PM)**

Pursuant to Construction Permit 015-3574, issued on January 20, 1995, and in order to comply with Condition D.3.6, the particulate matter overspray control systems (dry filters and waterwash systems) shall be in operation and control emissions from the coating spray booths at all times when the coating spray booths are in operation.

### **D.3.12 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters.
- (b) Daily inspections shall be performed to verify that the water curtain flow is making water/air contact along the entire length of the air opening. Should more than ten percent (10%) of the water curtain area be ineffective in impacting the air stream, then repairs or adjustments shall be completed. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water curtain.
- (c) To monitor the performance of the control systems, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (d) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emissions, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (e) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.3.13 Record Keeping Requirements**

- (a) To document compliance with Condition D.3.1, and pursuant to Construction Permit 015-3574 issued January 20, 1995, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (2) through (6) shall be taken daily; records shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.3.1.
  - (1) Pursuant to CP 015-3574, a complete Method 24 analysis for each coating used.
  - (2) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (3) A log of the dates of use;

- (4) The volume-weighted VOC content of the coatings used for each day;
  - (5) The total VOC usage for each day; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.3.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP and VOC usage limits established in Condition D.3.4.
  - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
  - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.
  - (4) The VHAP content in weight percent of each thinner used.
  - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.3.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Conditions D.3.11 and D.3.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.14 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A semi-annual NESHAP Continuous Compliance Report to document compliance with Conditions D.3.4 and D.3.5 shall be submitted using the reporting form located at the end of this permit, or the equivalent, within thirty (30) days after the end of the six (6) months being reported. This report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
- (2) July 1 through December 31.

The report shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590



## SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]; Insignificant Activity [326 IAC 2-7-1(21)]:

Plant 1 and Plant 2 woodworking facilities for furniture manufacturing, with baghouses for PM control.

Plant 3 woodworking facilities:

- (1) One (1) wood milling and sanding process, with two (2) dust collection systems including two (2) baghouses, identified as 8503 East and 8503 West; and
- (2) One (1) wood furniture assembly process.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).

#### D.4.2 Plant 3 Visible Emissions [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2-3 (PSD BACT) and CP 105-3574, issued January 20, 1995, no visible emissions are allowed from the building openings from the Plant 3 woodworking processes.

#### D.4.3 Plant 3 PM-10 and PM PSD Minor Limits [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2-3 (PSD BACT) and CP 105-3574, issued January 20, 1995:

- (a) The PM-10 emissions from the Plant 3 woodworking processes shall not exceed 3.119 pounds per hour. This limit is required to limit the potential to emit of PM-10 from Plant 3 to less than 15 tons per year.
- (b) The PM emissions from the Plant 3 woodworking processes shall not exceed 5.507 pounds per hour. This limit is required to limit the potential to emit of PM from Plant 3 to less than 25 tons per year.

Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable to the Plant 3 particulate matter emissions.

#### D.4.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations):

The allowable PM emission rate from the Plant 1 woodworking facilities shall not exceed 11.727 pounds per hour per department from the routing, sanding, and tenon departments, when operating at a process weight rate of 9,600 pounds per hour. The allowable PM emission rate from the Plant 2 woodworking facilities shall not exceed 6.740 pounds per hour when operating at a process weight rate of 4,200 pounds per hour.

These pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

**D.4.5 Compliance Schedule [326 IAC 2-7-4(c)(11)(B)] [326 IAC 2-7-6(3)] [326 IAC 6-4]**

The Permittee will be considered in compliance with Section C - Fugitive Dust Emissions (326 IAC 6-4), provided that:

- (a) The Permittee shall conduct bi-weekly inspections of the woodworking baghouse areas and the source grounds for leakage and spillage of sawdust. The Compliance Response Plan for the woodworking operations shall contain troubleshooting contingency and response steps for the sawdust outloading operation when abnormal emissions are observed or there is evidence of sawdust in the area surrounding the dust bins.
- (b) The Permittee shall prepare a written Fugitive Dust Control Plan for the woodworking operations consistent with the requirements of 326 IAC 6-5-5.
  - (1) The Plan shall be submitted for approval to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
within sixty (60) days after the date of issuance of this permit.
  - (2) If the Fugitive Dust Control Plan is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable Plan.
- (c) Any fugitive particulate matter emissions from the woodworking operations shall be controlled in accordance with the Fugitive Dust Control plan.

**D.4.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

**Compliance Determination Requirements**

**D.4.7 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)]**

The baghouses for PM control shall be in operation at all times when the woodworking facilities are in operation.

**D.4.8 Visible Emissions Observations [326 IAC 2-7-1(21)(G)(xxix)]**

Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:

- (a) The baghouse shall be inspected.
- (b) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

**D.4.9 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxix)]**

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.4.10 Broken or Failed Bag Detection**

In the event of a bag failure that causes the baghouse to emit visible emissions:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

**D.4.11 Plant 3 Parametric Monitoring**

Pursuant to CP 105-3574, issued January 20, 1995, the Permittee shall record the total static pressure drop across each of the 8503 East and 8503 West baghouses used in conjunction with the woodworking processes, at least once weekly when the woodworking process is in operation. Unless operated under conditions for which the Compliance Response Plan or Preventive Maintenance Plan specifies otherwise, the pressure drop across each baghouse shall be maintained within the range of 1.0 to 3.0 inches of water or a range established during the latest stack test. The Compliance Response Plan or Preventive Maintenance Plan for these baghouses shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

**D.4.12 Visible Emissions Notations**

Should the source ever elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.4.8 are not required, and will be replaced by the following:

- (a) Daily visible emission notations of each baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.4.13 Record Keeping Requirements [326 IAC 2-7-1(21)(G)(xxix)(GG)] [326 IAC 6-4]**

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- (a) To document compliance with Condition 4.5, the Permittee shall maintain records of the bi-weekly inspections of the woodworking baghouse areas and the source grounds
- (b) To document compliance with Condition D.4.8 or Condition D.4.12, the Permittee shall maintain records of the daily visible emission observations of each baghouse stack exhaust.
- (c) To document compliance with Conditions D.4.8 and D.4.9 the Permittee shall maintain records of the results of the inspections required under Conditions D.4.8 and D.4.9 and the dates the vents are redirected.
- (d) To document compliance with Condition D.4.11, the Permittee shall maintain weekly records of the inlet and outlet differential static pressure during normal operation.
- (e) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxix)(GG)(dd).
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Peters-Revington Furniture  
Source Address: 1100 N. Washington Street, Delphi, IN 46923  
Mailing Address: P. O. Box 238, Delphi, IN 46923-0238  
Part 70 Permit No.: T015-6045-00021

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) \_\_\_\_\_

9 Report (specify) \_\_\_\_\_

9 Notification (specify) \_\_\_\_\_

9 Affidavit (specify) \_\_\_\_\_

9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Peters-Revington Furniture  
Source Address: 1100 N. Washington Street, Delphi, IN 46923  
Mailing Address: P. O. Box 238, Delphi, IN 46923-0238  
Part 70 Permit No.: T015-6045-00021

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Management (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - C** The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report  
Plant 2 Monthly VOC Usage**

Source Name: Peters-Revington Furniture  
Source Address: 1100 N. Washington Street, Delphi, IN 46923  
Mailing Address: P. O. Box 238, Delphi, IN 46923-0238  
Part 70 Permit No.: T015-6045-00021  
Facility: Plant 2 surface coating  
Parameter: VOC  
Limit: Not more than 33 tons per month

YEAR: \_\_\_\_\_

Month	VOC Usage (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## OFFICE OF AIR QUALITY

### COMPLIANCE DATA SECTION

### Part 70 Quarterly Report

### Plant 2 VOC Daily Volume-Weighted Average

Source Name: Peters-Revington Furniture  
 Source Address: 1100 N. Washington Street, Delphi, IN 46923  
 Mailing Address: P. O. Box 238, Delphi, IN 46923-0238  
 Part 70 Permit No.: T015-6045-00021  
 Facility: Plant 2 surface coating  
 Parameter: VOC  
 Limit: Not more than **6.54** pounds per gallon of coating, as applied,  
 daily volume-weighted average

Year: \_\_\_\_\_

Month:				Month:	(cont.)	(cont.)	(cont.)
Day	VOC average (lbs/gallon)	VOC average (lbs/gallon)	VOC average (lbs/gallon)	Day	VOC average (lbs/gallon)	VOC average (lbs/gallon)	VOC average (lbs/gallon)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report  
Plant 3 VOC Usage**

Source Name: Peters-Revington Furniture  
Source Address: 1100 N. Washington Street, Delphi, IN 46923  
Mailing Address: P. O. Box 238, Delphi, IN 46923-0238  
Part 70 Permit No.: T015-6045-00021  
Facility: Plant 3 surface coating  
Parameter: VOC  
Limit: 295 tons per year, based on a 365-day period,  
rolled on a daily basis.

**Month:** \_\_\_\_\_ **Year:** \_\_\_\_\_

Day	Usage this day (ton/day)	Usage for the last 365-day period (tons/yr)	Day	Usage this day (ton/day)	Usage for the last 365-day period (tons/yr)
1			17		
2			18		
3			19		
4			20		
5			21		
6			22		
7			23		
8			24		
9			25		
10			26		
11			27		
12			28		
13			29		
14			30		
15			31		
16			<b>TOTAL</b>		

- 9 No deviation occurred in this quarter.  
9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
Semi-Annual Continuous Compliance Report  
Wood Furniture NESHAP**

Source Name: Peters-Revington Furniture  
Source Address: 1100 N. Washington Street, Delphi, IN 46923  
Mailing Address: P. O. Box 238, Delphi, IN 46923-0238  
Part 70 Permit No.: T015-6045-00021  
Facility: Surface Coating and Adhesive Application  
Parameter: VHAPs - NESHAP  
Limit/Requirement: (1) Finishing operations: 1.0 pound VHAP/pound solids  
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels:  
3% VHAP content by weight  
(3) All other thinner mixtures: 10% VHAP content by weight  
(4) Foam adhesives meeting the upholstered seating flammability requirements:  
1.8 pound VHAP/pound solids  
(5) All other contact adhesives: 1.0 pound VHAP/pound solids  
(6) Strippable spray booth material: 0.8 pound VOC per pound solids  
(7) The work practice implementation plan is being followed.

YEAR: \_\_\_\_\_

Month	Finishing Operations (lb VHAP/lb solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam Adhesives (upholstered) (lb VHAP/lb solid)	Contact Adhesives (lb VHAP/lb solid)	Strippable Spray Booth Material (lb VOC/lb solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Peters-Revington Furniture  
Source Address: 1100 N. Washington Street, Delphi, IN 46923  
Mailing Address: P. O. Box 238, Delphi, IN 46923-0238  
Part 70 Permit No.: T015-6045-00021

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## **Indiana Department of Environmental Management Office of Air Quality**

### **Addendum to the Technical Support Document for a Part 70 Operating Permit**

Source Name: **Peters-Revington Furniture**  
Source Location: **1100 N. Washington Street, Delphi, IN 46923**  
County: **Carroll**  
SIC Code: **2511**  
Operation Permit No.: **T015-6045-00021**  
Permit Reviewer: **Vickie Cordell**

On December 27, 2000, the Office of Air Quality (OAQ) had a notice published in the Carroll County Comet, Flora, Indiana, stating that Peters-Revington Furniture had applied for a Part 70 Operating Permit to operate a wood furniture manufacturing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

No comments were received. However, the name of the issuing office was changed from the Office of Air Management to the Office of Air Quality effective January 1, 2001. Therefore, the name of the office has been changed throughout the Title V permit. Also, all references to OAM have been changed to OAQ.

In addition, it is noted that the page numbering on the Technical Support Document (TSD) Appendix B erroneously indicates that the Appendix includes four (4) pages. Appendix B actually has only three (3) pages. No change will be made to the Appendix. The OAQ prefers that the TSD and any TSD Appendices reflect the permit that was on public notice. No information was missing from the Public Notice version.

# Indiana Department of Environmental Management

## Office of Air Management

### Technical Support Document (TSD) for a Part 70 Operating Permit

#### Source Background and Description

**Source Name:** Peters-Revington Furniture  
**Source Location:** 1100 N. Washington Street, Delphi, Indiana 46923  
**Mailing Address:** P.O. Box 238, Delphi, Indiana 46923-0238  
**County:** Carroll  
**SIC Code:** 2511  
**Operation Permit No.:** T015-6045-00021  
**Permit Reviewer:** Vickie Cordell

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Peters-Revington Furniture relating to the operation of a wood furniture manufacturing operation.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Plant 1:

- (1) Twelve (12) spray booths identified as No. 101 through 112; eleven (11) of the spray booths are controlled by dry filters and one (1) is controlled by water wash;
- (2) One (1) roll coating line; and
- (3) One (1) curtain coating line.

(b) Plant 2:

Ten (10) spray booths identified as No. 201 through 210, also known as the Building 16 coating facilities; nine of the spray booths are controlled by dry filters and one (1) is controlled by water wash.

(c) Plant 3:

- (1) Three (3) air assisted airless surface coating spray booths, identified as EP-P(2), EP-P(3), and EP-P(10), each equipped with a dry filter system controlling particulate matter (PM) overspray emissions;
- (2) One (1) air assisted airless surface coating spray booth, identified as EP-P(5), equipped with a water curtain controlling PM overspray emissions; and
- (3) Five (5) airless surface coating spray booths, identified as EP-P(4), EP-P(6), EP-P(7), EP-P(8), and EP-P(9), each with a dry filter system controlling PM overspray.

#### Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

#### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Woodworking operations: [326 IAC 2-2] [326 IAC 2-7-1(21)(G)(xxix)] [326 IAC 6-3]

- (1) Plant 1 and Plant 2 woodworking facilities for furniture manufacturing, with baghouses for PM control.
- (2) Plant 3 woodworking facilities:
  - (A) One (1) wood milling and sanding process, with two (2) dust collection systems including two (2) baghouses, identified as 8503 East and 8503 West; and
  - (B) One (1) wood furniture assembly process.
- (b) Space heaters, process heaters, or boilers using the following fuels:
  - Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including curing ovens.
- (c) Combustion source flame safety purging on startup.
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (e) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (f) The following VOC and HAP storage containers:
  - (A) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
  - (B) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids. VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (i) Paved and unpaved roads and parking lots with public access.
- (j) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (k) Other emergency equipment as follows: stationary fire pumps.
- (l) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3]
- (m) Filter or coalescer media changeout.
- (n) Other categories with emissions below significant thresholds: storage tank emissions.



## Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) Operation Permit 08-03-90-0086, issued on October 9, 1986;
- (2) Construction Permit PSD (08) 1692, issued on July 14, 1988;
- (3) Construction Permit CP 015-3574, issued on January 20, 1995;
- (4) Amendment 015-8050, issued on March 20, 1997; and
- (5) Amendment 015-8593, issued on December 29, 1997.

All conditions from previous approvals that were not previously superseded in an amendment were incorporated into this Part 70 permit, except the following:

Construction Permit PSD (08) 1692, issued on July 14, 1988, Operation Conditions 1, and 3:

1. That pursuant to 326 IAC 2-2-3 (3) (Best Available Control Technology requirements), volatile organic compound (VOC) emissions from the new (Building No. 16) furniture coating facilities shall be limited as follows:

<u>Booth</u>	<u>VOC Limit (Daily Average)</u>	<u>Spray Application Method</u>
Toner	6.38 lb VOC/gal coating minus water	Air-Assisted Airless
NGR & Sap Stain	6.62 lb VOC/gal coating minus water	Air-Assisted Airless
Washcoat	5.78 lb VOC/gal coating minus water	Airless
Wipe Stain	4.86 lb VOC/gal coating minus water	Airless
Sealer	5.52 lb VOC/gal coating minus water	Airless
Lacquers	4.92 lb VOC/gal coating minus water	Airless

3. That a log of information necessary to document compliance with Conditions Nos. 1 and 2 shall be maintained for the Building No. 16 furniture coating facilities. This data shall include the quantities, densities, and organic solvent contents of all coatings and solvent thinners and cleaners used. These records shall be kept for at least the past twenty-four month period and made available upon request of the Office of Air Management. A quarterly summary shall be submitted by the end of the month following the quarter being reported to:

Surveillance and Investigation Section (5)  
Office of Air Management  
105 South Meridian Street  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015

This data shall be submitted in the formats attached (pages 4 and 5).

Page 4 is a Daily Emissions Report, with stated units of lbs VOC/gal coating, with one coating per report. Page 5 is a Monthly Emissions Report for the Building 16 coating line, with a 33 tons per month VOC limit.

Reasons not incorporated:

- (a) It is believed that the individual VOC limits for the different coating types were calculated incorrectly at the time of permitting. Apparently the percent volatiles by volume were used rather than percent volatiles by weight. Also, the as-supplied VOC contents were used rather than the as-applied, or thinned, VOC contents. The multiple VOC limits for the various types of coatings have been converted to a single, plant-wide VOC limit using the corrected volatile contents and the coating usage information for one shift from the original construction permit application. This is considered to be a correction to the limit, not a relaxation, because there is no increase in the total VOC emissions. The inspector agrees with this correction. Using daily volume-weighted averaging, as was required by the original permit, the source can comply with the revised limit.
- (b) The source has switched to High Volume Low Pressure (HVLP) spray guns for some of the coating booths for compliance with the wood furniture NESHAP (40 CFR 63, Subpart JJ). The transfer efficiency of this application method is as good as or better than the efficiency of the methods required in the original BACT analysis.
- (c) The record keeping requirements and the address for submitting reports have changed since the permit was issued.

The revised Condition 1 is included in this TSD under State Rule Applicability - Surface Coating - Plant 2, and in the Title V permit as Condition D.2.1(b). Supporting documentation and calculations for the revision are included in **Appendix A**.

Construction Permit CP 015-3574, issued on January 20, 1995, as modified by Amendments A 015-8050, issued on March 20, 1997 and A 015-8593, issued on December 29, 1997; facility description for the Plant 3 baghouses, and Operation Condition 8:

- B) 2. Two (2) dust collection systems including two (2) baghouses, identified as 8503 East and 8503 West, each controlling the particulate matter (PM) and PM10 emissions generated by the wood milling process equipment at a design outlet grain loading of 0.02 gr/dscf for an input flow rate not to exceed 57,304 dscfm,
- 8. That the PM emissions from the wood milling process baghouses (East 8503 and West 8503) shall each be limited to 0.02 gr/dscf with an input flow rate not to exceed 57,304 dscfm or a value that meets compliance stack tests.

Reasons not incorporated:

- (a) The PM emissions from the woodworking process was originally limited to 0.02 gr/dscf with an input flow rate not to exceed 57,304 dscfm. This was based on the manufacturer's specifications for the baghouse and was done to limit the woodworking PM-10 and PM emissions below 15 tons per year. The 1997 Amendment changed the description from one baghouse to two baghouses but also inadvertently doubled the allowable emissions.
- (b) The original baghouse limitation was based on 2,000 hours of operation for the coating and woodworking operations. However, the hours of operation were not actually limited by the permit. Rather than restricting the hours of operation, the Plant 3 woodworking operations have now been given hourly PM-10 and PM limits to keep the emissions below PSD thresholds, based on 8,760 hours of operation per year.
- (c) The source has requested to have the woodworking operations regulated so that they will be an insignificant activity pursuant to 326 IAC 2-7-1(21)(G)(xxix) (Insignificant Activities). This requires that the woodworking baghouses not emit PM-10 in excess of 0.003 grains/dscf and not exhaust to the atmosphere greater than 125,000 dscfm. This is more stringent than the original grain loading limit.

A revised baghouse description is used in this TSD and in the Title V permit. The baghouse limit for insignificant activities and the revised PM-10 and PM limits for the Plant 3 woodworking are included in this TSD under State Rule Applicability - Woodworking Operations, and in the Title V permit as Conditions D.4.1, and D.4.3. The Plant 3 PM-10 and PM limit calculations are shown below under the heading Emission Calculations, and the woodworking and combustion emission calculations are shown in **Appendix B**.

### Enforcement Issue

IDEM is aware that Plant 2 has been exceeding some of the specified VOC limits in PSD (08) 1692. The source has never been able to comply with the original VOC limit for some of the coating categories. This has been noted in inspection reports since 1990. However, because the limits are believed to have been calculated incorrectly in the original permit, this portion of the BACT has been recalculated in the Title V using information from the original construction permit application. Supporting documentation and calculations are included in Appendix A of this Technical Support Document. This is considered to be a correction to the original permit, not a relaxation of the original requirement, as detailed above in the Existing Approvals section.

The inspector for the source has noted repeated violations of sawdust accumulated around baghouses and on the ground at other transfer points; however, no referral has been made for possible Enforcement action. These violations have been addressed by requiring the source to submit and follow a Fugitive Dust Control Plan.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on June 3, 1996. Additional information was received on April 3, September 14, September 23, and September 30, 1998, and October 25, October 27, October 31, and November 20, 2000.

A notice of completeness letter was mailed to the source on March 11, 1997.

### Emission Calculations

See Appendix A of this document for the recalculation of the BACT VOC limit for Plant 2, and Appendix B for detailed woodworking and Plant 3 combustion emissions calculations.

The new Plant 3 PM-10 and PM limits have been calculated as follows:

The original after-control potential PM-10 and PM emissions from the surface coating, as limited, is 0.727 tons per year.

The potential to emit of PM from the Plant 3 combustion facilities is 0.456 tons per year condensible PM and 0.152 tons per year filterable PM, for a total PM of 0.608 tons per year. All combustion PM is assumed to be PM-10.

To limit the Plant 3 PM-10 emissions below the PSD threshold of 15 tons per year, the woodworking PM-10 must be limited as follows:

$$15 \text{ tons} - (0.727 \text{ tons}_{\text{coating}} + 0.608 \text{ tons}_{\text{combustion}}) = \text{less than } 13.665 \text{ tons/year.}$$

$$\text{less than } 13.665 \text{ tons/year} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 3.119 \text{ lbs per hour.}$$

To limit the Plant 3 PM emissions below the PSD threshold of 25 tons per year, the woodworking PM must be limited to **less than**

$$25 \text{ tons} - (0.727 \text{ tons}_{\text{coating}} + 0.152 \text{ tons}_{\text{combustion}}) = \text{less than } 24.121 \text{ tons/year.}$$

$$\text{less than } 24.121 \text{ tons/year} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 5.507 \text{ lbs per hour.}$$

Therefore, the Plant 3 woodworking operations have now been given a PM-10 limit of 3.119 lbs/hr, and a PM limit of 5.507 lbs/hr.

## Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential to Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential to Emit (tons/year)
Unspecified Individual HAPs	greater than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 1-2-55) of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

## Actual Emissions

The following table shows the actual emissions from the source. The VOC figure reflects the 1997 emission inventory data, the other criteria pollutants reflect the 1996 OAM emission data as listed in the AIRS Facility Quick Look Report, dated January 22, 1999, and the HAP actual usage figures are from the 1996 Title V permit application. Note: Only HAPS with reported actual emissions of 1 ton per year or more are listed.

Pollutant	Actual Emissions (tons/year)
PM	0.04
PM-10	0.02
SO <sub>2</sub>	not reported
VOC	521
CO	not reported
NO <sub>x</sub>	not reported
Ethyl Benzene	16.68
Glycol Ethers	5.2
Methyl Alcohol	83.61
Methyl Ethyl Ketone	22.59
Methyl Isobutyl Ketone	27.03
Naphthalene	1.57
Toluene	184.36
Xylene	75.92

## Limited Potential to Emit / Source Status

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

	Limited Potential to Emit (tons/year)			
Process/facility	PM	PM-10	VOC	HAPs
Plant 1 surface coating facilities	Less than 100	Less than 100	Greater than 250	Greater than 250
Plant 2 surface coating facilities	Less than 100	Less than 100	Not more than 396	Greater than 250
Plant 3 surface coating facilities	0.7	0.7	Not more than 295	Greater than 250
Plant 1 woodworking operations	154.1	42.2		
Plant 2 woodworking operations	29.5	14.1		
Plant 3 woodworking operations	24.1	13.7		
Total Emissions	Less than 250	Less than 250	Greater than 250	Greater than 250

- (a) The VOC emissions for Plant 2 and Plant 3 are limited from prior permits.
- (b) The woodworking PM-10 is limited to be an insignificant activity pursuant to 326 IAC 2-7-1(21)(G)(xxix). PM is limited pursuant to 326 IAC 6-3. In addition, the PM and PM-10 emissions for Plant 3 are limited from a prior permit.

### County Attainment Status

The source is located in Carroll County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Carroll County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12, 40 CFR Part 60) applicable to this source.
- (b) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the wood furniture coating operations except when otherwise specified in 40 CFR 63 Subpart JJ.

The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations)), with a compliance date of November 21, 1997.

Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
  - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids, as applied; or
  - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

- (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
- (D) Use any combination of (A), (B), and (C).
- (2) Limit VHAP emissions from contact adhesives as follows:
  - (A) Use compliant contact adhesives as follows:
    - (i) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids;
    - (ii) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids;  
or
  - (B) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids, as applied.

The owner or operator of an affected source subject to this subpart shall maintain a written work practice implementation plan, as required by 40 CFR 63.803(a). The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-4-1.1 (New Source Toxics Control)**

This rule does not apply to any of the facilities at this source because all of the facilities were constructed before July 27, 1997.

##### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

### 326 IAC 5-1 (Opacity)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6)-minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1)-minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

## State Rule Applicability - Surface Coating Facilities

### Surface Coating - All Plants

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule is not applicable because the source did not begin operation between October 7, 1974, and January 1, 1980.

#### 326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from each of the coating booths shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters and water wash systems shall be in operation at all times the coating booths are in operation, in order to comply with this limit.

### Surface Coating - Plant 1

#### 326 IAC 2-2; 40 CFR 52.21 (PSD)

The provisions of 326 IAC 2-2-2(b)(PSD Applicability) and 40 CFR 52.21 do not apply to the Plant 1 surface coating facilities because Plant 1 was constructed in the 1940's and none of the facilities have been modified pursuant to 326 IAC 2-2-1(o) and 40 CFR 52.21(2) (Major Modification).

#### 326 IAC 8 (Volatile Organic Compounds (VOC))

Any change or modification which may increase potential emissions from the surface coating operation, shall require prior approval from the OAM to determine applicability requirements of 326 IAC 8, before such change may occur.

#### 326 IAC 8-1-6 (General Provisions Relating to VOC Rules)

326 IAC 8-1-6 (General Provisions Relating to VOC Rules) is not applicable because the Plant 1 surface coating facilities were constructed prior to January 1, 1980.

#### 326 IAC 8-2-1 (Surface Coating Emission Limitations: Applicability)

#### 326 IAC 8-2-12 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-2-1(a)(1 through 3) (Surface Coating Emission Limitations: Applicability), wood furniture and cabinet coating is not described in sections 2 through 8 or section 11 of this rule, and the source is located in Carroll county; therefore, none of the Plant 1 facilities are subject to 326 IAC 8-2 under these portions of the rule.



## Surface Coating - Plant 2

(Revisions from the original construction permit language are shown in bold and strikeout. The language in (a) has been updated to reflect current guidance that emission limits are only enforceable for operations that have continuous emission monitors to demonstrate compliance. In this instance, a limit on the amount of VOC input is preferred. Also, the wording that the monthly VOC limit is equivalent to 396 tons per 12 consecutive month period has been removed from the permit to avoid possible misinterpretation that this is a rolling monthly limit. The BACT requirements in (b) have been revised as explained in the Existing Approvals section of this TSD.)

326 IAC 2-2-3; 40CFR 52.21 (PSD BACT Limit)

- (a) **Pursuant to 326 IAC 2-2-3 (PSD Best Available Control Technology (BACT) Requirements) and Construction Permit PSD (08) 1692, issued on July 14, 1988, That total VOC emissions from the new (Building No. 16) furniture coating facilities shall be limited to use not more than 33 tons of volatile organic compound (VOC), including coatings, dilution solvents, and cleaning solvents, per month (396 tons per 12 consecutive month period).**
- (b) **That pursuant to 326 IAC 2-2-3 (3) (PSD BACT requirements):**
- (1) **The volume-weighted average volatile organic compound (VOC) emissions from content used at the new ( Building No. 16 ) furniture coating facilities shall be limited as follows: to not more than 6.54 pounds of VOC per gallon of coating minus water delivered to the coating applicator. Compliance with this limit shall be determined on a daily basis.**

<u>Booth</u>	<u>VOC Limit (Daily Average)</u>	<u>Spray Application Method</u>
Toner	6.38 lb VOC/gal coating minus water	Air-Assisted Airless
NGR & Sap Stain	6.62 lb VOC/gal coating minus water	Air-Assisted Airless
Washcoat	5.78 lb VOC/gal coating minus water	Airless
Wipe Stain	4.86 lb VOC/gal coating minus water	Airless
Sealer	5.52 lb VOC/gal coating minus water	Airless
Lacquers	4.92 lb VOC/gal coating minus water	Airless

- (b) (2) **The type of applicator used for all coatings shall be Airless, Air-Assisted Airless, or High Volume Low Pressure (HVLP). Alternate application methods may be used if the transfer efficiency of the alternate is equivalent to or greater than that of the listed methods HVLP spray application is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.**

(Note: the preceding Plant 2 requirements are Condition D.2.1 in the Title V permit, and are referred to in the following condition.)

### **(Volatile Organic Compounds (VOC))**

- (a) **Compliance with the VOC usage limitation contained in Condition D.2.1(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.**
- (b) **The volume-weighted averaging of the coatings used to determine compliance with the limitation set in Condition D.2.1(b) shall be determined by the following equation:**

$$A = [3 (C_1 \times U_1) + (C_2 \times U_2) + (C_3 \times U_3) + \dots (C_x \times U_x)] / 3 U_1 + U_2 + U_3 + \dots + U_x]$$

**Where:** A is the daily volume-weighted average in pounds VOC per gallon;  
C is the VOC content of an individual coating in pounds VOC per gallon; and  
U is the usage rate of the individual coating in gallons per day.

**The VOC content of an individual coating shall be determined pursuant to 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.**

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)

The Plant 2 surface coating facilities were installed after January 1, 1980, and are not otherwise regulated by other provisions of 326 IAC 8. Therefore, 326 IAC 8-1-6 is applicable to these facilities. No specific requirements for 326 IAC 8-1-6 were included in the 1988 construction permit. However, compliance with the 326 IAC 2-2 VOC BACT requirements also demonstrate compliance with the requirements of 326 IAC 8-1-6.

326 IAC 8-2-1 (Surface Coating Emission Limitations: Applicability)

326 IAC 8-2-12 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-2-1(a)(1 through 3) (Surface Coating Emission Limitations: Applicability), wood furniture and cabinet coating is not described in sections 2 through 8 or section 11 of this rule, and the source is located in Carroll county; therefore, none of the facilities are subject to 326 IAC 8-2 under these portions of the rule. Pursuant to 326 IAC 8-2-1(a)(4), the Plant 2 surface coating facilities were all installed prior to July 1, 1990; therefore these facilities are not subject to 326 IAC 8-2 under this portion of the rule. Consequently, 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) does not apply to any of the Plant 2 spray booths.

Surface Coating - Plant 3

(Revisions from the original construction permit language are shown in bold and strikeout. The wording was changed in response to past comments from the source that the original permit language was unclear. In addition, the Plant 3 coating booths have been in operation for several years; therefore, the daily VOC limit for the first year of operation is no longer relevant.)

326 IAC 2-2-3 (PSD BACT Limit)

Pursuant to 326 IAC 2-2-3 (PSD BACT) and Construction Permit 015-3574, issued on January 20, 1995, VOC Best Available Control Technology (BACT) shall be considered satisfied provided that:

- (a) The total amount of volatile organic compounds delivered to the applicators **of the surface coating spray booths EP-P(2) through EP-P(10)** does not exceed 295 tons per year, ~~calculated on a 365 consecutive day period, rolled on a daily basis, rolling daily total. During the first 365 days of operation, the total amount of VOC's delivered to the applicator shall be limited such that, the total amount of VOC's delivered to the applicator, divided by the days of operation shall not exceed 0.80 ton/day, and~~
- (b) The following pollution prevention techniques are applied:
  - (1) The cleanup solvents shall be stored in closed containers with soft gasketed spring-loaded closures,
  - (2) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly, and
  - (3) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

**326 IAC 8-2-12 (Volatile Organic Compounds (VOC))**

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

**326 IAC 8-1-6 (New Facilities: General Reduction Requirements)**

The Plant 3 surface coating facilities are regulated by the provisions of 326 IAC 8-2-12; therefore, 326 IAC 8-1-6 is not applicable to these facilities.

**State Rule Applicability - Woodworking Operations**

Woodworking - All Plants

**326 IAC 2-7-1(21)(G)(xxix) (Baghouse Limitations)**

The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).

**326 IAC 2-7-1(21)(G)(xxix) (Particulate Matter (PM))**

The baghouses for PM control shall be in operation at all times when the woodworking facilities are in operation.

**326 IAC 2-7-1(21)(G)(xxix) (Visible Emissions Observations)**

Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:

- (a) The baghouse shall be inspected.
- (b) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

**326 IAC 2-7-1(21)(G)(xxix) (Baghouse Inspections)**

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

**Note:** The requirements of 326 IAC 2-7-1(21)(G)(xxix) in conjunction with the baghouse compliance monitoring requirements make the woodworking operations an insignificant activity for Title V permitting. The source may add additional woodworking equipment controlled by the existing baghouses without obtaining a source modification or permit modification provided that the new equipment complies with all of the woodworking conditions in the Title V permit.

326 IAC 2-7-4(c)(11)(B); 326 IAC 2-7-6(3) (Compliance Schedule)

326 IAC 6-4 (Fugitive Dust)

The Permittee will be considered in compliance with Section C -Fugitive Dust Emissions (326 IAC 6-4), provided that:

- (a) The Permittee shall conduct bi-weekly inspections of the woodworking baghouse areas and the source grounds for leakage and spillage of sawdust. The Compliance Response Plan for the woodworking operations shall contain troubleshooting contingency and response steps for the sawdust outloading operation when abnormal emissions are observed or there is evidence of sawdust in the area surrounding the dust bins.
- (b) The Permittee shall prepare a written Fugitive Dust Control Plan for the woodworking operations consistent with the requirements of 326 IAC 6-5-5.

- (1) The Plan shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within sixty (60) days after the date of issuance of this permit.

- (2) If the Fugitive Dust Control Plan is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable Plan.
  - (c) Any fugitive particulate matter emissions from the woodworking operations shall be controlled in accordance with the Fugitive Dust Control plan.

#### Woodworking - Plants 1 and 2

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2(c) (Process Operations):

The allowable PM emission rate from the Plant 1 woodworking facilities shall not exceed 11.727 pounds per hour per department from the routing, sanding, and tenon departments, when operating at a process weight rate of 9,600 pounds per hour. The allowable PM emission rate from the Plant 2 woodworking facilities shall not exceed 6.740 pounds per hour when operating at a process weight rate of 4,200 pounds per hour.

These pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour.

### Woodworking - Plant 3

#### 326 IAC 2-2; 40 CFR 52.21 (Plant 3 Visible Emissions)

Pursuant to 326 IAC 2-2-3 (PSD BACT) and CP 105-3574, issued January 20, 1995, no visible emissions are allowed from the building openings from the Plant 3 woodworking processes.

(The PM-10 and PM requirements have been revised as explained in the Existing Approvals section of this TSD. Revisions from the original construction permit language are shown in bold and strikeout.)

#### 326 IAC 2-2; 40 CFR 52.21 (Plant 3 PM-10 and PM PSD Minor Limits)

~~That the PM emissions from the wood-milling process baghouses (East 8503 and West 8503) shall each be limited to 0.02 gr/dscf with an input flow rate not to exceed 57,304 dscfm, or a value that meets compliance stack tests.~~

**Pursuant to 326 IAC 2-2-3 (PSD BACT) and CP 105-3574, issued January 20, 1995:**

- (a) The PM-10 emissions from the Plant 3 woodworking processes shall not exceed 3.119 pounds per hour. This limit is required to limit the potential to emit of PM-10 to less than 15 tons per year.**
- (b) The PM emissions from the Plant 3 woodworking processes shall not exceed 5.507 pounds per hour. This limit is required to limit the potential to emit of PM to less than 25 tons per year.**

**Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable to the Plant 3 woodworking particulate matter emissions.**

**Note:** This hourly PM limit is less than 16.514 lbs/hr, the allowable PM emission rate that would result from applying the equation in 326 IAC 6-3-2(c) (Process Operations) to the Plant 3 woodworking operation. Therefore, compliance with the Plant 3 PM limit will also demonstrate compliance with 326 IAC 6-3.

### **State Rule Applicability - Degreasing**

#### 326 IAC 8-3 (Organic Solvent Degreasing Operations)

This rule is not applicable to the insignificant degreasing operation because the source is located in Carroll County and the degreaser was constructed before January 1, 1980.

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The coating spray booths have applicable compliance monitoring conditions as specified below:

1. **Particulate Matter (PM)**  
The dry filters and waterwash systems for PM control shall be in operation and control emissions from the coating spray booths at all times when the coating spray booths are in operation.
2. **Monitoring**
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters.
  - (b) Daily inspections shall be performed to verify that the water curtain flow is making water/air contact along the entire length of the air opening. Should more than ten percent (10%) of the water curtain area be ineffective in impacting the air stream, then repairs or adjustments shall be completed. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water curtain.
  - (c) To monitor the performance of the control systems, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (d) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emissions, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (e) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

The woodworking has applicable compliance monitoring conditions as specified below:

1. **Broken or Failed Bag Detection**  
In the event of a bag failure that causes the baghouse to emit visible emissions:
  - (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- 2. Plant 3 Parametric Monitoring  
Pursuant to CP 105-3574, issued January 20, 1995, the Permittee shall record the total static pressure drop across each of the 8503 East and 8503 West baghouses used in conjunction with the woodworking processes, at least once weekly when the woodworking process is in operation. Unless operated under conditions for which the Compliance Response Plan or Preventive Maintenance Plan specifies otherwise, the pressure drop across each baghouse shall be maintained within the range of 1.0 to 3.0 inches of water or a range established during the latest stack test. The Compliance Response Plan or Preventive Maintenance Plan for these baghouses shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.  
  
The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- 3. Visible Emissions Notations  
Should the source ever elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.4.8 are not required, and will be replaced by the following:
  - (a) Daily visible emission notations of each baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
  - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
  - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
  - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the dry filters, waterwash systems, and baghouses must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

### **Conclusion**

The operation of this wood furniture manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T015-6045-00021**.



Appendix A: Calculations and Documentation  
Plant 2 VOC BACT Correction

Company Name: Peters-Revington Furniture  
Address City IN Zip: 1100 N. Washington Street, Delphi, IN 46923-0238  
Permit No./Plt ID: T015-6045-00021  
Reviewer: Vickie Cordell  
Date: November 21, 2000

The following pages were submitted by Bruce Carter Associates, L.L.C., contractor for Peters-Revington Furniture. The pages include tables showing the calculation of the as-applied volatile organic compound (VOC) content for each category of coating material, calculation of the new daily volume-weighted average VOC content limit for the Plant 2 surface coating operations, supporting documentation for the correction, and a demonstration that Peters-Revington will be able to comply with the new limit. These pages have been reviewed by Vickie Cordell, OAM Permits.

Revised Best Available Control Technology (BACT) requirements for the Plant 2 surface coating operations have been incorporated in the Title V permit.



**Bruce Carter Associates, L.L.C.**  
**ENVIRONMENTAL CONSULTANTS**  
AIR • WATER • SOLID WASTE • OSHA • REMEDIATION SERVICES

October 31, 2000

Indiana Department of Environmental Management  
Office of Air Management - Permits Branch  
Indiana Government Center North, 10<sup>th</sup> Floor  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, IN 46206-6015

ATTN: Vickie Cordell

Re: **Peters-Revington Furniture**  
**Part 70 No: T015-6045-00021**  
**Notice of Deficiency**

RECEIVED  
OCT 31 2000  
OFFICE OF AIR MANAGEMENT

Dear Ms Cordell,

This letter is being submitted on behalf of Peters-Revington Furniture in response to your Notice of Deficiency requesting an updated BACT analysis for the Plant 2 surface coating. Based on our review, an updated BACT analysis is not required for this facility because Peters-Revington is not requesting a relaxation of any emission limits established in the 1988 permit, only corrections to resolve the mistakes that were made in the preparation of the 1988 permit and modifications in permit terms that do not increase the permit limits.

The numerical limits that are listed in the present draft of the Part 70 Permit were based on erroneous numbers that were generated in the application process for the 1988 permits. These numbers have been accepted as incorrect for some time as noted by previous IDEM inspection reports, and as such, Peters-Revington Furniture is requesting the following corrections be incorporated in the final Part 70 Permit. In addition, we have developed a modification that will provide Peters-Revington the flexibility to adjust coating systems to meet product demands that does not increase allowable emissions. The suggested changes are:

1. Correct errors in the 1988 permit. In 1993 Peters-Revington submitted a letter to IDEM requesting that the improper VOC lbs/gal contents submitted in the application for the 1988 permit be replaced with correct values. A copy of the 1993 letter and numeric values are enclosed for reference as Attachment A. In addition, the 1988 permit did not consider ready to spray formulations. We are requesting that the VOC lbs/gal contents be corrected to the coatings in the 1993 letter as ready to spray values. The lbs VOC/gallon numbers, as submitted in the 1993 letter and corrected for ready to spray formulations used at the time are as follows:

<u>Material</u>	<u>Lbs VOC/Gal less water</u>
SAP Stain	6.68
Toner	6.89
NGR Stain	6.75
Washcoat	6.19

6330 E. 75th St., Suite 300  
Indianapolis, IN 46250  
Phone (317) 578-4233  
Fax (317) 578-4250

733 Princeton St.  
Elkhart, IN 46516  
Phone (219) 522-1019  
Fax (219) 522-0374

149 W. Main St.  
New Albany, IN 47150  
Phone (812) 944-3520  
Fax (812) 944-3557

e-mail: [bca@bcaconsultants.com](mailto:bca@bcaconsultants.com)

(800) 291-1019

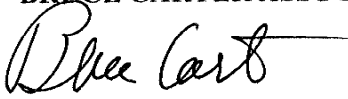
Wipestain	7.06
Sealer	6.18
Lacquer	6.05

2. Simplify the VOC lbs/gallon average from an individual material average to a facility wide weighted average of 6.54 lbs VOC/gal less water. The facility wide weighted average is calculated by taking the corrected VOC lbs/gal contents as submitted in the 1993 correction letter determining the ratio of thinner and reducer used in formulation and determining the facility wide weighted average based on 1988 maximum usage rates. The maximum usage rates were based on the maximum usage of a coating in an 8 hour time period. These rates were identified in the 1988 TSD in the table titled "Peters-Revington Furniture VOC Emission Permit Calculations" (copy enclosed as Attachment B). A table summarizing the calculations used to obtain the facility wide weighted average of 6.54 lbs VOC/gallon, less water, is enclosed as Attachment C "VOC Lb/Gal Calculations". The facility wide weighted average should not be considered a relaxation in the VOC lbs/gal restrictions, but a way to accurately represent the VOC emissions from individual products as a single coating emission rate. The use of this system will allow Peters-Revington the flexibility to manage their coating systems to achieve production goals while at the same time achieving ready to spary emission levels equivalent to the ones established in the 1988 permit as corrected in the 1993 correspondence.

We would like to reiterate that none of these changes are relaxations of any permit limits. The requested changes are 1) corrections to resolve errors in the 1988 permit and 2) representation of the corrected 1988 permit limits as a facility wide average.

Sincerely,

**BRUCE CARTER ASSOCIATES, L.L.C.**



Bruce Carter  
President

Enclosures

cc: Bruce Hankins - Peters-Revington Furniture

10-Nov-00

Attachment C

VOC Lb/Gal Calculations  
Based on 1988 Usage Rates

Material	Max Use Possible (Gal) (per 8 hrs)	Maximum GPH	Percentage of Total	1993 VOC Lbs/Gallon. Correction	Ready to Spray VOC lbs/Gal	Weighted VOC Average
Toner	66.00	8.25	10.37%	6.89	6.89	0.715
Washcoat	66.00	8.25	10.37%	6.19	6.19	0.642
NGR Stain	66.00	8.25	10.37%	6.75	6.75	0.700
SAP Stain	30.00	3.75	4.72%	6.75	6.675	0.318
SAP Thinner	30.00	3.75	4.72%	6.6		0.311
Wiping Stain	66.00	8.25	10.37%	4.76	7.055	0.494
Solvent (467)	39.60	4.95	6.22%	10.17		0.633
Retarder	39.60	4.95	6.22%	7		0.436
Sealer	66.00	8.25	10.37%	6.18	6.18	0.641
Lacquer	167.00	20.88	26.25%	6.01	6.049	1.578
Thinner (s1842)	3.04	0.38	0.48%	7.09		0.034
Retarder (490-1806)	3.04	0.38	0.48%	7.13		0.034
Total		79.53	100.00%			6.54

\* Weighted VOC Average for individual product = Percentage of total \* 1993 VOC Lbs/Gallon = Weighted VOC Average



## Bruce Carter Associates, L.L.C.

ENVIRONMENTAL CONSULTANTS

AIR • WATER • SOLID WASTE • OSHA • REMEDIATION SERVICES

November 13, 2000

Indiana Department of Environmental Management  
Office of Air Management - Permits Branch  
Indiana Government Center North, 10<sup>th</sup> Floor  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, IN 46206-6015

ATTN: Vickie Cordell

Re: **Peters-Revington Furniture**  
**Part 70 No: T015-6045-00021**  
**Notice of Deficiency**

Dear Ms Cordell,

We appreciate the opportunity to clarify the methodology used to arrive at the "ready to spray" numbers used to determine the target 6.54 lbs VOC/Gal number requested as a facility wide average. The ready to spray numbers were arrived at by determining the recommended thinning methods for any product that is sprayed, and using these mix ratios to adjust the mixture VOC lbs/gallon.

The ready to spray VOC Lbs/Gal numbers for the products in question are calculated as follows:

Product	VOC Content (Lbs/Gal)	Thinning Ratio	Ready To Spray VOC Content (Lbs/Gal)
SAP Stain	6.75	1 Gal Sap Stain 1 Gal Sap Thinner 6.60 # VOC/Gal	6.675
NGR Stain	6.75	No Thinning	6.75
Toner	6.89	No Thinning	6.89
Wash Coat	6.19	No Thinning	6.19
Wipe Stain	4.76	2.5 Gal Wipe Stain 1.5 Gal Solvent (467) 10.17 # VOC/Gal 1.5 Gal Retarder (1520C00004) 7.00 # VOC/Gal	7.055
Sealer	6.18	No Thinning	6.18
Lacquer	6.01	55 Gal Topcoat 1 Gal( 40-1806) 7.13 # VOC/Gal 1 gal (S-1842) 7.09 # VOC/Gal	6.049

6330 E. 75th St., Suite 300  
Indianapolis, IN 46250  
Phone (317) 578-4233  
Fax (317) 578-4250

733 Princeton St.  
Elkhart, IN 46516  
Phone (219) 522-1019  
Fax (219) 522-0374

149 W. Main St.  
New Albany, IN 47150  
Phone (812) 944-3520  
Fax (812) 944-3557

e-mail: [bca@bcaconsultants.com](mailto:bca@bcaconsultants.com)

(800) 291-1019

To arrive at the calculated Ready to spray VOC contents, the formula is as follows:

$$\frac{(V_1 * VOC_1) + (V_2 * VOC_2)}{V_1 + V_2}$$

Where:

$V_1$  = Volume of Coating  
 $V_2$  = Volume of Dilutant  
 $VOC_1$  = VOC Pounds per gallon of Coating  
 $VOC_2$  = VOC Pounds per gallon of Dilutant

In situations where there are more than one dilutant, the following formula would be used:

$$\frac{(V_1 * VOC_1) + (V_2 * VOC_2) + (V_n * VOC_n)}{V_1 + V_2 + V_n}$$

Where:

$V_1$  = Volume of Coating  
 $V_2$  = Volume of Dilutant  
 $V_n$  = Volume of Additional Dilutant  
 $VOC_1$  = VOC Pounds per gallon of Coating  
 $VOC_2$  = VOC Pounds per gallon of Dilutant  
 $VOC_n$  = VOC Pounds per gallon of Additional Dilutant

We hope that this information will help to clarify the methodology that we used to arrive at the "Ready to Spray" VOC Lbs/Gallon numbers used to arrive at the 6.54 pounds VOC per gallon of coating facility wide average.

If there are any further questions, please feel free to contact me at (219) 522-1019.

Sincerely,

**BRUCE CARTER ASSOCIATES, L.L.C.**



Michael R. Cira  
Project Manager

Enclosures

cc: Bruce Hankins - Peters-Revington Furniture

Peters-Revington Furniture  
Delphi, Indiana

Page 7 of 11 TSD App A  
T015-6045-00021

Monthly Lbs VOC/GAL	
Monthly Averages for 1999	
Month	Lbs/Gal VOC
January	6.44
February	5.88
March	5.85
April	6.09
May	5.06
June	6.19
July	6.48
August	6.14
September	6.44
October	6.08
November	6.08
December	6.15

Monthly Lbs VOC/GAL	
Monthly Averages for 2000	
Month	Lbs/Gal VOC
January	4.84
February	6.00
March	6.25
April	5.59
May	6.03
June	6.39
July	5.72
August	3.81
September	5.64
October	ERR
November	ERR
December	ERR

Michael R. Cira

BRUCE CARTER ASSOCIATES, L.L.C.

(219) 522-1019

**Peters-Revington Furniture**

1100 N. Washington Street  
P.O. Box 238  
Delphi, Indiana 46923-0238  
(317) 564-2586  
FAX (317) 564-3722



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APR 26 1993

CASHIER/PAYROLL

Attachment A

22 April, 1993

Mr. Jeff Teague  
IDEM Office of Air Management  
P.O. Box 7060  
Indianapolis, IN  
46206-7060

CP#015-2968

Jeff,

I have researched the original Plant #2 pre-construction permit application from 1987, in an attempt to clarify some of the issues surrounding our Plant #2 finish room expansion. In doing so I have spoken with Mr. Steve Neff who did most of the work on the original application. Mr. Neff is no longer with Peters-Revington, but was able to provide some insight into the original (1987) application.

We are currently using the same products in our finish system that we were using at the time of our original permit application. I am enclosing copies of the MSDS that were submitted in 1987 by Mr. Neff.

Mr. Neff arrived at the figures for lbs VOC / gal coating with the assistance of one of your engineers whom we believe to be a Mr. David Zell. Unfortunately, the numbers at which they arrived seem to be incorrect. It appears as though the percent volatiles by volume was used rather than the percent by weight. Mr. Neff stated that the formula used to derive these numbers was provided by the IDEM engineer, David Zell, with whom he had spoken.

According to our finish supplier, Akzo Chemical, formerly Reliance Chemical, there have been very little, if indeed any, changes in the levels of VOCs / gal coating since 1987. We therefore feel confident that the lbs VOC / gal coating were essentially the same in 1987 as they are now, but an error was made in the calculations.



In addition, it appears as though someone failed to take into account the material used to reduce, or thin, the finish chemicals. These MSDS were supplied with the application, and these thinners and reducers are significantly higher in VOCs than the rest of the finish chemicals. Therefore, any use of the thinner or reducer would automatically place us out of compliance with the lbs VOC / gal coating limit. We are still, as we always have, running well below the monthly limit of 33 tons of VOCs.

If there are any more questions that we can answer, or concerns that you have regarding our pre-construction permit application, please notify me as soon as possible.

Sincerely,



Vanessa Criswell  
Health and Safety Coordinator

cc. Michael Thomas, President Peters-Revington  
John Schilling, Vice-President Peters-Revington

# Plant 2 Expansion Data 4/22/93

NOW			1987 (submitted)	
	Material	lbs VOC/g	material	lbs VOC/g
SAP	500-DI-2399 B	6.75	500-RI-211	6.62
	500-DI-2394 A	6.73		
	500-RI-211 C	6.71		
Reducer	240-RMI-100	6.62	240-100	6.60
Toner	431-GI-1691	6.89	431-DI-1691	6.38
	431-DI-2102 D	6.40		
	431-DI-1766	6.64		
Thinner	S-213	7.09	S-213	7.09
NG&R	500-DI-2359	6.75	500-DI-1773	6.62
	500-DI-1773 B	6.65		
Thinner	S-213	7.09	240-100	6.60
Ashcoat	422-PI-158	5.84	421-PI-619	5.78
	421-PI-619A	6.18		
Thinner	S-213	7.09	S213	7.09
Ipe stain	546-DI-3408	4.76	546-DI-	4.86
	546-DI-3151 C	4.57		
	546-DI-2212 C	4.72		
	546-DI-2439	4.46		
Retarder	210-RMI-405	7.00	210-405	7.00

Plant 2 cont.

	NOW		1987 (submitted)	
	<u>Material</u>	<u>lbs VOC/g</u>	<u>Material</u>	<u>lbs VOC/g</u>
aler	421-PI-619 A	6.18	421-PI-619	5.52
acquer	401-55CI-669 C	6.01	401-55CI-699	4.92
rinner	5213	7.09	250-308	6.80

Appendix B: Emissions Calculations  
Particulate (Woodworking as Insignificant Activity)

Company Name: Peters-Revington Furniture  
Address City IN Zip: 1100 N. Washington Street, Delphi, IN 46923-0238  
Permit No./Plt ID: T015-6045-00021  
Reviewer: Vickie Cordell  
Date: December 11, 2000

Potential PM Emissions \* :

PLANT 1:	lumber processed: router:	9,600 lbs/hr		
	sawdust generated:	154 lbs/hr	Maximum potential emissions before control:	674.5 tons/year
	lumber processed: sanding:	9,600 lbs/hr		
	sawdust generated:	154 lbs/hr	Maximum potential emissions before control:	674.5 tons/year
	lumber processed: tenon:	9,600 lbs/hr		
	sawdust generated:	154 lbs/hr	Maximum potential emissions before control:	674.5 tons/year
PLANT 2:	lumber processed:	4,200 lbs/hr		
	sawdust generated:	588 lbs/hr	Maximum potential emissions before control:	2575.4 tons/year
PLANT 3:	lumber processed:	16,000 lbs/hr		
	sawdust generated:	305 lbs/hr	Maximum potential emissions before control:	<u>1335.9 tons/year</u>
<b>TOTAL potential PM Emissions from woodworking:</b>				<b>5934.8 tons/year</b>

Allowable PM-10 Emissions:

The source has requested to have the woodworking operations meet the requirements of insignificant an activity; therefore, pursuant to 326 IAC 2-7-1(21)(G)(xxix) (Insignificant Activities), the allowable PM-10 emission rate for each of the Plant 1 and Plant 2 woodworking baghouses is calculated using the following equation:

$$E = 0.003 \text{ grains/dscf} \times 125,000 \text{ dscfm} / 7000 \text{ grains/lb} \times 60 \text{ min/hr} = 3.214 \text{ lbs PM/hr}; = 14.078 \text{ tons/year}$$

PLANT 1: router baghouse, sanding baghouse, and tenon baghouse:  $3 \times 14.078 \text{ tons PM/yr} = \mathbf{42.23 \text{ tons/year}}$

PLANT 2: with one baghouse: **14.07 tons/year**

(continued on next page)

Appendix B: Emissions Calculations  
Particulate (Woodworking as Insignificant Activity) - continued

Company Name: Peters-Revington Furniture  
Permit No./Plt ID: T015-6045-00021  
Date: December 11, 2000

Allowable PM-10 Emissions (continued):

PLANT 3:

Pursuant to 326 IAC 2-2-3 (PSD BACT), the combined PM-10 emissions from all of the Plant 3 woodworking operations are limited to **3.119 lbs/hr**. This limits the woodworking PM-10 emissions for Plant 3 to **13.66 tons/year**, and limits the overall Plant 3 PM-10 emissions to less than 15 tons per year. Therefore, a BACT analysis is not required for the Plant 3 PM-10 emissions. (The insignificant woodworking requirements also apply to Plant 3; however, the PSD limit is stricter.)

**TOTAL allowable PM-10 emissions from all Plant 1, Plant 2, and Plant 3 woodworking operations: 70.0 tons PM per year.**

Allowable PM Emissions:

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable PM emission rates for the Plant 1 and Plant 2 woodworking were calculated with the following equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

PLANT 1: router:  $E = 4.10 (9,600 \text{ lbs/hr}/2000 \text{ tons/lb})^{0.67} = 11.727 \text{ lbs PM/hr}; = 51.367 \text{ tons PM/yr}$

sanding:  $E = 4.10 (9,600 \text{ lbs/hr}/2000 \text{ tons/lb})^{0.67} = 11.727 \text{ lbs PM/hr}; = 51.367 \text{ tons PM/yr}$

tenon dept:  $E = 4.10 (9,600 \text{ lbs/hr}/2000 \text{ tons/lb})^{0.67} = 11.727 \text{ lbs PM/hr}; = 51.367 \text{ tons PM/yr}$

PLANT 2:  $E = 4.10 (4,200 \text{ lbs/hr}/2000 \text{ tons/lb})^{0.67} = 6.740 \text{ lbs PM/hr}; = 29.521 \text{ tons PM/yr}$

PLANT 3:

Pursuant to 326 IAC 2-2-3 (PSD BACT), the combined PM emissions from all of the Plant 3 woodworking operations are limited to **5.507 lbs/hr**. This limits the woodworking PM emissions for Plant 3 to **24.12 tons/year**, and limits the overall Plant 3 PM emissions to less than 25 tons per year. Therefore, a BACT analysis is not required for the Plant 3 PM emissions. (326 IAC 6-3-2 also applies to Plant 3; however, the PSD limit is stricter.)

**TOTAL allowable PM emissions from all Plant 1, Plant 2, and Plant 3 woodworking operations: 207.7 tons PM per year.**

(continued on next page)

Appendix B: Emissions Calculations  
Particulate (Woodworking as Insignificant Activity) - continued

Company Name: Peters-Revington Furniture  
Permit No./Plt ID: T015-6045-00021  
Date: December 11, 2000

PM Emissions after control:

PLANT 1:	router: baghouse & cyclone (99% and 90% control efficiency):	154 lbs/hr (1 - .90)(1 - .99) =	0.154 lb PM/hr;	=	0.675 ton/year
	sanding: baghouse & cyclone (99% and 90% control efficiency):	154 lbs/hr (1 - .90)(1 - .99) =	0.154 lb PM/hr;	=	0.675 ton/year
	tenon: baghouse & cyclone (99% and 90% control efficiency):	154 lbs/hr (1 - .90)(1 - .99) =	0.154 lb PM/hr;	=	0.675 ton/year
PLANT 2:	woodworking: baghouse & cyclone (99% and 90% control):	588 lbs/hr (1 - .90)(1 - .99) =	0.588 lb PM/hr;	=	2.575 ton/year
PLANT 3:	woodworking: two baghouses (99% control):	305 lbs/hr (1 - .99)	=	<u>3.05 lbs PM/hr;</u>	= <u>13.359 tons/year</u>
<b>TOTAL PM emissions from woodworking, after control:</b>			<b>4.10 lb PM/hr</b>		<b>17.96 tons/year</b>

METHODOLOGY

\* No process weight rate or PM emission rate information was included in the TV application. Therefore, information from previous permit applications was used for potential and allowable PM rate calculations, and all sawdust reported was presumed to be PM for the uncontrolled PM calculations.

Emissions (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs = Annual emissions (tons/yr)

NOTE: The original construction permit for Plant 3, CP 015-3574, calculated the annual allowable PM emissions for Plant 3 based on 2,000 hours of operation per year but the permit did not restrict the hours of operation. Therefore, the 2,000 hours of operation was not an enforceable condition and has not been used for this permit.